

**Re: SAP clarification****Harry Craig** to: Bath, Bill

09/17/2012 08:57 AM

"Matsushita, Gene S", "Lynden Peters"
Cc: (Lynden.Peters@arcadis-us.com)", Dennis Faulk, Christy Brown,
Linda Meyer, Mary Queitzsch, Cami Grandinetti, Thabet Tolaymat

Bill,

This proposal of extractive sampling at one only vent and one manhole at each landfill is unacceptable to EPA. Based on the text in the SAP Section 2.4, EPA expects that *a//* RCRA Landfill vents and *a//* CERCLA Landfill vaults/manholes will have extractive laboratory analysis sampling conducted.

2.4 RCRA and CERCLA Landfill Vents, Sumps and Pump Stations: Field Monitoring and Extractive Sampling

The hand-held surveys and extractive sampling will be conducted at each source location: at the RCRA landfill sump and three vents, and at the CERCLA landfill's four manholes and two lift stations.

These are some of the most important samples for assessing quantitative gas concentrations at the highest potential sources at the landfills. One lab sample at each landfill is not acceptable to adequately assess the extent of gas migration from the landfills. Frankly, EPA has some serious concerns about your contractor's execution of this SAP, after we went through multiple drafts to get a somewhat "clean" version to execute in the field. Now we get these additional "interpretations" of what the SAP means.

Regards,

Harry

"Bath, Bill"

Harry- The SAP has an inconsistency between...

09/15/2012 01:01:47 PM

From: "Bath, Bill" <bill.bath@lmco.com>
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Date: 09/15/2012 01:01 PM
Subject: SAP clarification

Harry- The SAP has an inconsistency between Table 1 and the text on the number of extractive lab samples. Table 1 specifies 1 RCRA vent sample based on "worst case" instrument screening and 1 worst case CERCLA manhole sample. The text states that all 3 RCRA vents and all CERCLA manholes will be sampled. Arcadis ordered sampling equipment based on Table 1. Please approve sampling the "worst case" RCRA vent and CERCLA manhole consistent with Table 1.

I left you an identical voice mail message on your cell phone at 11:45am today.

We agreed yesterday on sampling the middle RCRA vent under SAP Section 2.3 (sampling in breathing zones), so we are focusing efforts today on completing this sampling and the RCRA sump while we resolve the issue about Section 2.4 sampling.

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